



Relay North Dakota
FCC Certification Renewal Supplemental Information

May 8, 2018

ATTN:

Dana Wilson,
Federal Communications Commission
Consumer and Governmental Affairs Bureau
Disability Rights Office
445 12th Street, SW
Washington, DC 20554

CG DOCKET NO. 03-123

Dear Ms. Wilson,

Pursuant to the Commission's request, *Relay North Dakota* hereby supplements previously filed TRS recertification application with the enclosed information.

Our Contractor, Sprint files Federal Communications Commission's ("FCC") Customer Proprietary Network Information ("CPNI") compliance certification with FCC annually as required. See Attachment A.

Relay North Dakota TRS program is compliance to all the requirements of the CPNI rules that are now TRS mandatory minimum standards.

If there are any questions regarding this filing, please contact Doug Hay at 701-328-080 or dhay@nd.gov. Thank you for your assistance.

Respectfully submitted,



Roxanne Ennen
Network Administrator

ATTACHMENT A

SPRINT'S STATEMENT OF CPNI COMPLIANCE

Sprint Corporation ("Sprint") complies with the Federal Communications Commission's ("FCC") Customer Proprietary Network Information ("CPNI") minimum standards with respect to Sprint's role as a contractor supporting STATE's Telecommunications Relay Service ("TRS") program. However, per 47 C.F.R. §64.606(c)(1), it is STATE's responsibility to certify STATE's TRS program every 5 years. The following statement only explains the operating procedures established by Sprint to ensure its compliance with the CPNI rules (see 47 C.F.R. §64.5101 *et seq.*) as a contractor supporting the State TRS program for the current 5-year certification period (calendar years 2013-2017); the statement does not address STATE's compliance as the STATE TRS program administrator or the activities of any other contractors that STATE may use to support the STATE TRS program. Per the FCC, STATE has an obligation to provide a CPNI statement to the FCC in accordance with FCC 47 C.F.R. §64.604(d) and 64.606(c)(1).

Data Brokers

As the STATE's contractor, Sprint did not detect any pretexting activities by data brokers during the certification period.

CPNI Complaints

As the STATE's contractor, Sprint did not receive any complaints during the certification period concerning the unauthorized release of TRS CPNI.

Use, Disclosure and Access to CPNI

As the STATE's contractor, Sprint did not use, disclose or permit access to TRS CPNI in 2017 without complying with procedures specified in 47 C.F.R. §64.5101 *et seq.* Sprint did not use, disclose, or permit access to TRS CPNI for marketing purposes or for any other reason not authorized in 47 U.S.C. §64.5105(c).

Safeguards

As the STATE's contractor, Sprint takes reasonable measures to discover and protect against attempts to gain unauthorized access to TRS CPNI. Consistent with Sprint's commitment to preserving customer privacy, as the STATE's contractor, Sprint has a variety of training programs for its employees and subcontractors. The training explains how Sprint employees and subcontractors must access, use, store, disclose and secure CPNI to ensure compliance with the FCC's rules and Company policies. During the certification period, all Sprint employees and all subcontractors who had access to TRS CPNI took CPNI training.

As the STATE's contractor, Sprint also maintains a disciplinary process as part of Sprint's procedures that addresses CPNI compliance. Sprint security personnel investigate instances of potential improper access or disclosure of CPNI by employees. If the investigation indicates a violation has occurred, disciplinary action is taken, up to and including termination.

Before disclosing CPNI to subcontractors, Sprint enters into agreements with strict privacy and confidentiality provisions that require the subcontractor to maintain confidentiality, protect the information, and comply with the law. Sprint's Office of Privacy continually reviews contract terms and conditions to ensure that those provisions adequately safeguard customer information. In negotiating and renewing its contracts, Sprint requires subcontractors with which it shares CPNI to safeguard this information in a manner that is consistent with the FCC's rules and retains the right to terminate the contract in the event of a breach.

Authentication

Sprint does not currently offer users of the STATE TRS service telephonic, online, or in-store access to TRS CPNI. Therefore, the authentication requirements in 47 C.F.R. §64.5110 are not

applicable at this time with respect to Sprint's role as STATE's contractor.

Notification of Account Changes

Sprint provides notice to STATE's TRS users in accordance with the FCC's requirements when a triggering event occurs that falls within scope of Sprint's responsibilities.

Notification of CPNI Breaches

In accordance with the FCC's rules, Sprint provides notice to law enforcement in the event that a breach of customer information includes CPNI. Sprint also provides notice to impacted customers after completing the process of notifying law enforcement. Such notification provides customers with enough information to understand the nature of the breach, the scope of impacted information and recommendations on how the customer should respond. If the impacted customer alerts Sprint of a potential breach, Sprint investigates the customer's allegations and communicates as necessary with the customer and/or law enforcement. Sprint did not have any breaches of STATE TRS CPNI during the certification period.